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Plaintiff and Trustee of the LPG Liquidation Trust
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9 UNITED STATES BANKRUPTCY COURT

10 CENTRAL DISTRICT OF CALIFORNIA – SANTA ANA DIVISION

11 In re

12 THE LITIGATION PRACTICE GROUP P.C.,

13 Debtor.

14 RICHARD A. MARSHACK, Trustee of the
15 LPG Liquidation Trust,

16 Plaintiff,

17 v.

18 BSYD MANAGEMENT CORP., a New York
19 corporation and DOES 1 through 20, inclusive,

20 Defendants.

Case No. 8:23-bk-10571-SC

Chapter 11

Adv. No. 8:25-ap-01082-SC

STIPULATION TO EXTEND DEADLINE
TO RESPOND TO COMPLAINT

[NO HEARING REQUIRED]

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1 This stipulation (“Stipulation”) is entered into by and between Plaintiff, Richard A.
2 Marshack, Trustee of the LPG Liquidation Trust (“Plaintiff”) and Defendant, BSYD Management
3 Corp., a New York corporation (“Defendant”). Plaintiff and Defendant, are collectively referred to
4 as the “Parties.”

Recitals

6 A. On March 20, 2023, the Debtor filed a voluntary petition under Chapter 11 of Title
7 11 of the United States Code, initiating bankruptcy Case No. 8:23-bk-10571-SC in the United States
8 Bankruptcy Court for the Central District of California, Santa Ana Division.

9 B. Richard A. Marshack (previously defined as “Plaintiff”) was the duly-appointed,
10 qualified, and acting Chapter 11 Trustee for the Debtor’s bankruptcy estate (“Estate”). Pursuant to
11 the confirmed Plan, the Trustee now serves as Trustee of the LPG Liquidation Trust, which now
12 owns all of the litigation claims, including the Estate’s avoidance actions.

13 C. On March 6, 2025, Plaintiff filed a Complaint for: (1) Avoidance, Recovery, and
14 Preservation of Actual Fraudulent Transfers [11 U.S.C. §§ 544, 548(a)(1)(A), 550, 551; Cal. Civ.
15 Code §§ 3439.04(a)(1) and 3439.07]; (2) Avoidance, Recovery, and Preservation of Constructive
16 Fraudulent Transfers [11 U.S.C. §§ 544, 548(a)(1)(B); 550, 551; Cal. Civ. Code §§ 3439.04(a)(2),
17 3439.05, and 3439.07]; and (3) Disallowance of Claims Held by Defendant [11 U.S.C. § 502(d)]
18 (“Complaint”). The Complaint was assigned as Adversary Proceeding No. 8:25-ap-01082-SC
19 (“Adversary Proceeding”).

D. On March 10, 2025, as Dk. No. 3, the Court issued a summons and notice of status conference. The deadline to file and serve a written response to the Complaint was April 9, 2025.

22 E. Plaintiff has extended the deadline for Defendant to file and serve a written response
23 to the Complaint. The current deadline to respond to the Complaint is May 7, 2025.

24 F. The Parties are currently in settlement negotiations which may result in the dismissal
25 of this Adversary Proceeding.

26 G. The Parties have agreed to further extend the deadline for Defendant to file a response
27 to the Complaint from May 7, 2025, to May 21, 2025.

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1 The Parties agree and STIPULATE as follows:

2 1. The deadline for Defendant to file a response to the Complaint is extended to

3 **May 21, 2025;**

4 2. The Parties shall comply with all applicable federal and local rules; and

5 3. This Stipulation may be executed in one or more counterparts and facsimile or
6 electronic signatures may be used in filing this document with the Court.

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8 DATED: May 7, 2025

MARSHACK HAYS WOOD LLP

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10 By: /s/ Chad V. Haes
11 CHAD V. HAES
12 Attorneys for Plaintiff, Richard A. Marshack,
13 Trustee of The LPG Liquidation Trust

14 DATED: May 7, 2025

MORVILLO ABRAMOWITZ GRAND IASON &
15 ANELLO PC

16 By: 
17 CHRISTOPHER B. HARWOOD (pro hac vice
18 application forthcoming)
19 Attorney for Defendant, BSYD
20 MANAGEMENT CORP., a New York
21 Corporation

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PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is: 870 Roosevelt, Irvine, CA 92620.

A true and correct copy of the foregoing document entitled: **STIPULATION TO EXTEND DEADLINE TO RESPOND TO COMPLAINT** will be served or was served (a) on the judge in chambers in the form and manner required by LBR 5005-2(d); and (b) in the manner stated below:

1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF): Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On **May 7, 2025**, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

- **ATTORNEYS FOR PLAINTIFF: Aaron E. De Leest** adeleest@marshackhays.com, adeleest@marshackhays.com,alinares@ecf.courtdrive.com
- **ATTORNEYS FOR PLAINTIFF: Chad V Haes** chaes@marshackhays.com, chaes@ecf.courtdrive.com;cmendoza@ecf.courtdrive.com;cmendoza@marshackhays.com;alinares@ecf.courtdrive.com
- **ATTORNEYS FOR PLAINTIFF: D Edward Hays** ehays@marshackhays.com, ehays@ecf.courtdrive.com;alinares@ecf.courtdrive.com;cmendoza@marshackhays.com;cmendoza@ecf.courtdrive.com
- **PLAINTIFF: Richard A Marshack (TR)** pkraus@marshackhays.com, ecf.alert+Marshack@titlexi.com
- **U.S. TRUSTEE: United States Trustee (SA)** ustpregion16.sa.ecf@usdoj.gov

Service information continued on attached page

2. SERVED BY UNITED STATES MAIL: On **May 7, 2025**, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

Defendant

BSYD Management Corp.
Attn: General Counsel, or CEO, or Officer,
Managing or General Agent, or Any Other
Agent Authorized to Receive Service
of Process
5308 13th Ave
Brooklyn, NY 11219-3804

Courtesy Copy

Attorneys for BSYD Management Corp.
Christopher B. Harwood
Morvillo Abramowitz Grand Iason & Anello, P.C.
565 Fifth Avenue
New York, NY 10017

Service information continued on attached page

3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL (state method for each person or entity served): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on **May 7, 2025**, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

Via Personal Delivery

PRESIDING JUDGE'S COPY
Honorable Scott C. Clarkson
Bin beside 5th Floor Elevators
U.S. Bankruptcy Court, Ronald Reagan Federal Building
411 West Fourth Street
Santa Ana, CA 92701-4593

Service information continued on attached page

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

May 7, 2025
Date

Chanel Mendoza
Printed Name

/s/ Chanel Mendoza
Signature